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Attorneys for Victor Buchanan

UNITED STATES DISTRICT COURT

DISTRICT OF ALASKA

GLOBAL SEAFOODS NORTH AMERICA, LLC,))
Plaintiff,))
VS.))
VICTOR BUCHANAN,))
Defendant.)) CIVIL ACTION NO. A05-272 CV(JWS))

ANSWER

Defendant VICTOR BUCHANAN, through counsel, answers plaintiff's complaint as follows:

- 1. Paragraph 1 is admitted.
- 2. As to paragraph 2, plaintiff is without sufficient knowledge to affirm or deny the averments in paragraph 2, and they are therefore denied.
 - 3. As to paragraph 3, the averments in paragraph 3 are admitted.
- 4. As to paragraph 4, defendant admits that during January and February 2005, necessaries were provided to the DECCA DAWN, but he denies that these necessaries were in the total amount alleged by plaintiff. Defendant

JAMIN SCHMITT ST. JOHN 323 CAROLYN ST. KODIAK, AK 99615 (907) 486-6024 admits that some of these necessaries were provided by Global, and others were provided by other vendors on Buchanan's behalf with advances by Global. Defendant admits that during January and February 2005, necessaries were provided to the ADRIANA, but he denies that these necessaries were in the total amount alleged by plaintiff. Defendant admits that some of these necessaries were provided by Global, and others were provided by other vendors on Buchanan's behalf with advances by Global. Defendant admits that during January 2005, necessaries were provided to the CHISNIK ISLAND, but he denies that these necessaries were in the total amount alleged by plaintiff and he denies that necessaries were provided in February 2005. Defendant admits that these necessaries were provided by Global, but denies that such necessaries were provided by other vendors on Buchanan's behalf with advances by Global. Defendant admits that during January and February 2005, necessaries were provided to the JADE ALASKA, but he denies that these necessaries were in the total amount alleged by plaintiff and he denies that necessaries were provided in March 2005. Defendant admits that some of these necessaries were provided by Global, and others were provided by other vendors on Buchanan's behalf with advances by Global. Defendant denies that the total cost of necessaries for which Buchanan became liable to Global is in the amount alleged by plaintiff. Defendant denies any averment in paragraph 4 that is not specifically admitted above.

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5. As to the averments in paragraph 5, defendant admits that he delivered fish and cash payments to Global to satisfy the debts referenced in paragraph 4, but he denies plaintiff's averment that the fish were valued at \$59,965.71 and that the cash payments totaled \$6010.60. Defendant also denies plaintiff's averment regarding the total balance remaining due on the debts referenced in paragraph 4. Defendant denies any averment in paragraph 5 that is not specifically admitted above.

Dated: 1/4/06

s/ Matthew D. Jamin JAMIN SCHMITT ST. JOHN 323 Carolyn St. Kodiak, AK 99615 907.486.6024 ABA No. 7410085

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CERTIFICATE OF SERVICE

I hereby certify that, a copy of foregoing Answer was served on Mark C.

Manning by First Class U.S. mail this day of January 4, 2006:

Mark C. Manning 431 W. 7th Ave., Suite 204 Anchorage, AK 99501

Dated: 1/4/06

JAMIN SCHMITT ST. JOHN 323 CAROLYN ST. KODIAK, AK 99615 (907) 486-6024

s/ Matthew D. Jamin JAMIN SCHMITT ST. JOHN 323 Carolyn St. Kodiak, AK 99615 907.486.6024 ABA No. 7410085